

**UNITED STATE DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Case No. 21-487 (RBK)
	:	
v.	:	
	:	
JOSEPH GEROMINI	:	

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR DEFENDANT**

To: Eric A. Boden, Esquire, Assistant US Attorney for the District of New Jersey  
Trenton, NJ

Joseph Geromini, Defendant  
205 Arlington Avenue  
Linwood, NJ 08221

**PLEASE TAKE NOTICE** that on, Friday, December 20, 2021 at 9:00 a.m. or as soon thereafter as counsel may be heard, Flaster/Greenberg P.C., attorneys for defendant Joseph Geromini, J. Philip Kirchner, Esquire, one of its shareholders, appearing, shall move pursuant to Local Civil Rule 102.1 for entry of an order granting it leave to withdraw as defendant's counsel.

**PLEASE TAKE FURTHER NOTICE** that Flaster/Greenberg will rely upon the attached Certification of J. Philip Kirchner, Esq., and Exhibits in support of this Motion.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is attached.

**PLEASE TAKE FURTHER NOTICE** that oral argument is not requested.

**FLASTER/GREENBERG P.C.**  
Attorneys for Defendant Joseph Geromini

By: /s/ J. Philip Kirchner  
J. Philip Kirchner, Esquire

DATED: November 17, 2021